

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Global Expedited Package Services 3 (MC2010-28)  
Negotiated Service Agreement

Docket No. CP2016-54

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE NOTICE CONCERNING MODIFICATION TO  
GLOBAL EXPEDITED PACKAGE SERVICES 3  
NEGOTIATED SERVICE AGREEMENT

(September 26, 2016)

I. INTRODUCTION

The Public Representative hereby provides comments pursuant to the Commission's Notice Initiating Dockets.<sup>1</sup> In that Notice, the Commission reopens the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of filing a modification to Global Expedited Package Services 3 (GEPS 3) Negotiated Service Agreement (Agreement).<sup>2</sup>

The Commission approved the original GEPS 3 contract in Order No. 2946, dated December 29, 2015.<sup>3</sup> On September 26, 2016 the Postal Service filed the Notice that it had agreed to a modification to the existing GEPS 3 negotiated service agreement subject of the current docket (Modification). To support the Notice, the

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<sup>1</sup> Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, September 19, 2016 (Order).

<sup>2</sup> Notice of the United States Postal Service of Filing Modification to Global Expedited Package Services 3 Negotiated Service Agreement, September 16, 2016 (Notice).

<sup>3</sup> Order Approving Additional Global Expedited Package Services 3 Negotiated Service Agreement, (Order No. 2946), December 29, 2015.

Postal Service filed certified statement of compliance with 39 U.S.C. § 3633(a), a redacted copy of the Modification and redacted versions of the revised supporting financial documents. In addition, the Postal Service filed (under seal) the unredacted Modification and unredacted financial documentation.

The Modification revises the following articles: 1, 3, 4, 6, 7, 8, 9, 16, 20, 24, and Annex 1. *Notice; Attachment 1* at 1-2. The rates in the Modification are intended to become effective upon completion of the Commission's review. *Id.*

## II. COMMENTS

The Public Representative has reviewed the Postal Service's Notice, the original and modified GEPS 3 contract, and the supporting financial model filed under seal. Based upon that review, the Public Representative concludes that the modified contract continues to be functionally equivalent to the baseline agreement. In addition, it appears that the negotiated prices in the modified contract should generate sufficient revenue to cover costs.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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